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Company, Disney Media and Entertainment
8 *Distribution LLC, Disney DTC LLC, Disney*
Streaming Services LLC, Disney Entertainment &
9 *Sports LLC, Disney Platform Distribution, Inc.,*
10 *BAMTech LLC, Hulu, LLC, and ESPN, Inc.*

11 **IN THE UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DIVISION AT LOS ANGELES**

14 INTERDIGITAL INC.,
15 INTERDIGITAL VC HOLDINGS,
16 INC., INTERDIGITAL MADISON
17 PATENT HOLDINGS, SAS, AND
18 INTERDIGITAL CE PATENT
19 HOLDINGS, SAS,

20 Plaintiffs and
21 Counterclaim-
22 Defendants,

23 v.

24 THE WALT DISNEY COMPANY,
25 DISNEY MEDIA AND
26 ENTERTAINMENT DISTRIBUTION
27 LLC, DISNEY DTC LLC, DISNEY
28 STREAMING SERVICES LLC,
DISNEY ENTERTAINMENT &
SPORTS LLC, DISNEY PLATFORM
DISTRIBUTION, INC., BAMTECH,
LLC, HULU, LLC, AND ESPN, INC.,

Defendants and
Counterclaim-
Plaintiffs.

Case No. 2:25-cv-895

**DEFENDANTS' FED. R. CIV. P.
7.1 DISCLOSURE STATEMENT**

1 Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendants The
2 Walt Disney Company (“TWDC”); Disney Media & Entertainment Distribution
3 LLC (“DMED”); Disney DTC LLC (“DDTC”); Disney Streaming Services LLC
4 (“DSS”); Disney Entertainment & Sports LLC (“DES”); Disney Platform
5 Distribution, Inc. (“DPD”); BAMTech LLC (“BAMTech”); Hulu, LLC “Hulu”;
6 and ESPN, Inc. (“ESPN”) (collectively, the “Defendants”) state as follows:

7 As of the filing date of the Complaint, TWDC is a publicly held company.
8 No other publicly held company owns 10% or more of TWDC’s stock.

9 As of the filing date of the Complaint, DMED is an indirectly wholly owned
10 subsidiary of TWDC. No other publicly held company owns 10% or more of
11 DMED’s stock.

12 As of the filing date of the Complaint, DDTC is an indirectly wholly owned
13 subsidiary of TWDC, a publicly held company. No other publicly held company
14 owns 10% or more of DDTC’s stock.

15 As of the filing date of the Complaint, DSS is an indirectly wholly owned
16 subsidiary of TWDC, a publicly held company. No other publicly held company
17 owns 10% or more of DSS’s stock.

18 As of the filing date of the Complaint, DES is an indirectly wholly owned
19 subsidiary of TWDC, a publicly held company. No other publicly held company
20 owns 10% or more of DES’s stock.

21 As of the filing of the Complaint, DPD is an indirectly wholly owned
22 subsidiary of TWDC, a publicly held company. No other publicly held company
23 owns 10% or more of DPD’s stock.

24 As of the filing of the Complaint, BAMTech is an indirect subsidiary of
25 TWDC, a publicly held company that indirectly owns 80% of BAMTech, and
26 Hearst Brazil, Inc., a subsidiary of The Hearst Corporation that owns the remaining
27 20% of BAMTech. No other publicly held company owns 10% or more of
28 BAMTech’s stock.

1 As of the filing of the Complaint, Hulu is an indirect subsidiary of TWDC, a
2 publicly held company that indirectly owns 66.67% of Hulu, and Comcast Hulu
3 Holdings, LLC, a subsidiary of Comcast Corporation, a publicly traded company
4 that owns the remaining 33.33% of Hulu. No other publicly held company owns
5 10% or more of Hulu's stock.

6 As of the filing of the Complaint, ESPN is an indirect subsidiary of TWDC, a
7 publicly held company that indirectly owns 80% of ESPN, and Hearst Brazil, Inc.,
8 a subsidiary of The Hearst Corporation that owns the remaining 20% of ESPN. No
9 other publicly held company owns 10% or more of ESPN's stock.

10 Other than the parties in this case and the entities identified above, no other
11 party has a pecuniary interest in the outcome of this case. These representations are
12 made to enable the Court to evaluate possible disqualification or recusal.

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14 Dated: March 31, 2025

15 RYAN K. YAGURA
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18
19 By: /s/ Ryan K. Yagura
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22 *Entertainment Distribution LLC, Disney*
23 *DTC LLC, Disney Streaming Services*
24 *LLC, Disney Entertainment & Sports*
25 *LLC, Disney Platform Distribution, Inc.,*
26 *BAMTech LLC, Hulu, LLC, and ESPN,*
27 *Inc.*
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